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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

DEC 17 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Jurisdictional Separations Reform)	CC Docket No. 80-286
And Referral to the Federal-State)	
Joint Board)	
)	
Comments on the Separation)	FCC No. DA 99-2677
Simulation Cost Study Tool)	

COMMENTS OF SBC COMMUNICATIONS INC.

SBC Communications Inc.¹ appreciates the opportunity to comment on the NARUC Separations Simulations Cost Study Tool (NARUC Tool). The scenarios built into the currently, filed NARUC Tool are very restrictive; since they only evaluate changes in the assignment of Internet usage and proposes a new treatment of loops for ADSL services. SBC supports the broader USTA program for evaluation of separations changes. The USTA program evaluates and provides results for all of the following changes, which have already been proposed to the Joint Board:

- USTA Freeze proposal
- NARUC three year rolling average
- Estimate of effects of classifying Internet usage as interstate
- Estimate of the effects of changing the gross allocator for loop plant from 25% to 15% or SLU (Subscriber Line Usage) or 40% or 33 1/3%.

Any tool or program needs to be able to evaluate all of the changes that have already been proposed to the Joint Board or FCC in this Docket. In its current form, the

¹ SBC Communications Inc. is the parent company of various subsidiaries, including telecommunications carriers. These subsidiaries include Southwestern Bell Telephone Company (SWBT), Pacific Bell, Nevada Bell, The Southern New England Telephone Company (SNET), and Ameritech. The abbreviation "SBC" shall be used herein to include each of these subsidiaries as appropriate in the context.

NARUC Tool does not provide a specific worksheet for an evaluation of the USTA Freeze Proposal or even its "own three-year rolling average" proposal.

It is important to be able to evaluate a separations freeze, such as that proposed by USTA and being reviewed by the State Members of the Joint Board, for several reasons. First, the idea of a freeze of the separations process has been under consideration since comments were filed in the Notice of Proposed Rulemaking in 1997. Second, the freeze represents an important step in the eventual elimination of the separations process. Rather than addressing changes to individual factors which, at least for price cap companies, have little if any impact on a companies operations and on their service to customers, a freeze would be a clear signal about the long-term goal of simplification of the regulatory process, at least as far as separations is concerned. The freeze would be a significant simplification of the existing process, while still maintaining consistency with the overall jurisdictional allocation, particularly for those carriers electing the price cap form of treatment. A freeze would, also remove the specter of separations from other regulatory considerations, such as access reform and universal service. However, such a momentous change should not be implemented without careful analysis. The USTA tool can be used to perform that analysis; the NARUC tool makes no provision for a freeze analysis.

Further, while SBC does not disagree with NARUC regarding the Internet, i.e. that it is jurisdictionally interstate, it does disagree with the assumptions made in the evaluation of ADSL and the combined Internet/ADSL scenario. The ADSL scenario assigns all of the costs of ADSL-capable loops, these are assumed to be 30 % of the current subscriber or common lines, to interstate which is inconsistent with the existing tariffs of certain companies who have not assigned loop costs to ADSL. This assumption essentially creates an implicit subsidy for the voice services using the message loop by allocating all of the cost for the loop to ADSL and none to voice, seemingly contrary to

actions already taken in the universal service docket regarding implicit subsidies. Finally, since the provision of ADSL service is designed, at least in part, to move Internet related traffic off the public switched network and on to the ADSL network, combining Internet and ADSL without any changes in the underlying assumptions in removing at least some of the Internet traffic from the switched network is incorrect.

SBC offers the following specific suggestions regarding the NARUC Tool. First, it would facilitate the process of running the tool if the data required for input was included. Since the NARUC Tool provides a summary of results for the ARMIS companies, this data should be readily available and would increase the convenience of using the model. The USTA Separations Reform Analysis Program does provide a copy of the raw data for the ARMIS companies that is necessary to run the USTA Program.

In addition, the calculation of the separated amounts seems unnecessarily complicated. Basing the calculations on a process that multiplies a usage factor times a cost distribution (based on a comparison of "category cost" to the aggregated cost) times an aggregated cost seems to include an extra step in the process, especially since there are no changes made to the cost distribution. This extra step also makes it more complicated to find the allocator used for the cost. The process could be simplified by eliminating the step relating to the aggregated cost, since it is not changed in the process.

SBC looks forward to working with the Joint Board and the FCC in the further evaluation and simplification of the separations rules for all Local Exchange Carriers.

Respectfully Submitted

By: 

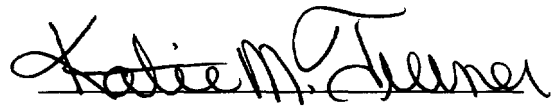
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CERTIFICATE OF SERVICE

I, Katie M. Turner, hereby certify that the foregoing "COMMENTS OF SBC COMMUNICATIONS INC." in CC Docket No. 80-286 and FCC No. DA 99-2677 has been filed this 17th day of December 1999 to the Parties of Record.

A handwritten signature in cursive script that reads "Katie M. Turner". The signature is written in black ink and is positioned above a horizontal line.

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